

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: : Chapter 13
THOMAS WRIGHT :
Debtor : Bankruptcy No. 18-12162MDC

CHAPTER 13 STANDING TRUSTEE'S ANSWER TO MOTION TO MODIFY PLAN

William C. Miller, Chapter 13 standing trustee (“standing trustee”), files his answer to the Motion to Modify Plan (the “Motion”), in recognition of the provisions of 11 U.S.C. § 1329(d), as follows:

1. Such provisions only apply to plans confirmed prior to March 27, 2020.
2. The Motion needs to explain the “material financial hardship” and how it was “due, directly or indirectly,” to the COVID 19 virus.
3. Amended Schedules I and J must be filed, to show that the modified plan is feasible.
4. Any supplemental attorneys’ fees, subject to an appropriate fee application, and the court’s approval, must be reasonable.
5. The payments originally designated to be paid to the unsecured creditors should not be reduced.

WHEREFORE, the standing trustee requests that any Order permitting the modification be consistent with the foregoing.

Respectfully submitted,

/s/ William C. Miller, Esquire

Date: September 16, 2020

William C. Miller, Esquire
Chapter 13 Standing Trustee